

1 JESSE LASLOVICH
 2 United States Attorney
 3 MADISON L. MATTIOLI
 4 MT Bar No. 36411284
 5 ABBIE J.N. CZIOK
 6 MT Bar No. 55781377
 7 Assistant U.S. Attorneys
 8 U.S. Attorney's Office
 9 901 Front Street, Suite 1100
 Helena, MT 59626
 Phone: (406) 457-5269 – Madison
 (406) 457-5268 – Abbie
 Fax: (406) 457-5130
 Email: madison.mattioli@usdoj.gov
 abbie.cziok@usdoj.gov

10 Attorneys for Federal Defendants and
 11 Defendant United States of America.

12 MARK STEGER SMITH
 13 MT Bar No. 4160
 14 TIMOTHY A. TATARKA
 15 CA Bar No. 277219
 Assistant U.S. Attorneys
 U.S. Attorney's Office
 James F. Battin Federal Courthouse
 2601 2nd Ave. North, Suite 3200
 Billings, MT 59101
 Phone: (406) 247-4667 – Mark
 (406) 247-4642
 Fax: (406) 657-6058
 Email: mark.smith3@usdoj.gov
 timothy.tatarka@usdoj.gov

16 **IN THE UNITED STATES DISTRICT COURT**
 17 **NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION**

18 CALIFORNIA COALITION FOR WOMEN
 19 PRISONERS; R.B.; A.H.R.; S.L.; J.L.; J.M.;
 20 G.M.; A.S.; and L.T., individuals on behalf of
 21 themselves and all others similarly situated,

22 Plaintiffs

23 v.

24 UNITED STATES OF AMERICA FEDERAL
 25 BUREAU OF PRISONS, a governmental entity;
 BUREAU OF PRISONS DIRECTOR
 COLETTE PETERS, in her official capacity;
 FCI DUBLIN WARDEN THAHESHA JUSINO,
 in her official capacity; OFFICER
 BELLHOUSE, in his individual capacity;
 OFFICER GACAD, in his individual capacity;
 OFFICER JONES, in his individual capacity;
 LIEUTENANT JONES, in her individual
 capacity; OFFICER LEWIS, in his individual
 capacity; OFFICER NUNLEY, in his individual
 capacity, OFFICER POOL, in his individual
 capacity, LIEUTENANT PUTNAM, in his
 individual capacity; OFFICER SERRANO, in
 his individual capacity; OFFICER SHIRLEY, in
 his individual capacity; OFFICER SMITH, in his
 individual capacity; and OFFICER VASQUEZ,
 in her individual capacity,

26 Defendants.

27 CASE NO. 4:23-CV-04155

28 **SECOND DECLARATION OF BETH REESE**

1 I, Beth Reese, declare as follows:

2 1. I have personal knowledge of the facts set forth herein and if called as a witness I could
3 competently so testify.

4 2. I am the Chief of the Office of Internal Affairs (OIA) for the federal Bureau of Prisons
5 (BOP). I have held this role since May of 2018. I oversee the work of approximately 145 staff
6 throughout the United States.

7 3. OIA an independent component of the Director's Office and is responsible for classifying
8 all allegations of BOP employee misconduct it receives and investigating serious but non-criminal
9 employee misconduct.

10 [REDACTED]

11 [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 [REDACTED]

16 [REDACTED]

17 [REDACTED]

18 [REDACTED]

19 [REDACTED]

20 [REDACTED]

21 [REDACTED]

22 [REDACTED]

23 [REDACTED]

24 [REDACTED]

25 [REDACTED]

26 [REDACTED]

27 [REDACTED]

28 [REDACTED]

1 [REDACTED]
2 [REDACTED]
3
4 I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct.
5 Executed this 7th day of March, 2024, at Washington, D.C.

6 **BETH REESE** Digitally signed by BETH REESE
7 Date: 2024.03.07 14:50:03
8 -05'00'
9 _____
10 Beth Reese